

State of Tennessee
IN THE CHANCERY COURT FOR HAMILTON COUNTY

LETEASHA YOUNG

PLAINTIFF

v.

DOCKET NO. 14-0088**VISION HOSPITALITY GROUP**

DEFENDANT

SUMMONSTO DEFENDANT: Vision Hospitality Group d/b/a DoubleTree HotelWHOSE ADDRESS IS Registered Agent Mitul I Patel, 2034 Hamilton Blvd. Ste. 200, Chattanooga, TN 37421-6102.OTHER SERVICE INFORMATION Plaintiff will serve

You are summoned and required to Answer and make defense to a Complaint herewith served upon you. Your Answer to the Complaint must be filed and served upon plaintiff's attorney on or before thirty (30) days after service of this Summons and Complaint upon you, exclusive of the day of service. Your Answer must be filed in the OFFICE OF THE CLERK & MASTER, 625 Georgia Avenue, Room 300 Courthouse, Chattanooga, Tennessee 37402. You are also required to serve a copy of your Answer upon the plaintiff's attorney, or the *pro se* plaintiff as set out below. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

ISSUED & TESTED this 7th day of February, 2014.

S. LEE AKERS, CLERK & MASTER

By: Charlene Simon

DEPUTY CLERK & MASTER

PATY, RYMER & ULIN, P.C.

RANDALL LARRAMORE

#18760

Plaintiff Attorney

BPR#

or Plaintiff if no attorney (*pro se*)19 Patten Parkway

Address

Chattanooga, TN 37402(423) 756-6770

Tel. NO.

(423) 756-0009

Fax NO.

NOTICE TO DEFENDANT(S)

Tennessee Code Annotated § 26-2-103 provides a \$10,000.00 personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk & Master. The list may be filed at any time and may be changed by you thereafter as necessary; however unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you, would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Exhibit 1

SUMMONS RETURN

I received this summons on _____, I certify and return that on _____, I
(Date) (Date)

☐ served this summons and a complaint on defendant, _____
in the following manner: (Printed Name of Defendant)

☐ failed to serve this summons within thirty (30) days after its issuance because:

Process Server Name (Printed)

Process Server Signature

Address

**IN THE CHANCERY COURT OF
HAMILTON COUNTY, TENNESSEE**

LETEASHA YOUNG
Plaintiff,

v.

VISION HOSPITALITY GROUP
d/b/a DOUBLETREE HOTEL
Defendant.

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:
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Case No.. 14-0088

Part _____

Jury Demanded

COMPLAINT

Comes Plaintiff, LeTeasha Young, by and through Counsel, and brings this action against the Defendant, Vision Hospitality Group d/b/a DoubleTree, ("Vision") and for her cause of action, alleges as follows:

Jurisdiction

1. Jurisdiction in the case is invoked for violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.* and the Equal Pay Act of 1963, 29 U.S.C.A. § 206 (d).
2. Plaintiff, is and at all times material to this action was, a citizen and resident of Hamilton County, Tennessee.
3. The Defendant, Vision Hospitality Group, is a Tennessee corporation registered to do business in the State of Tennessee. Defendant currently maintains hotel operations in Hamilton County, Tennessee, under the name of DoubleTree.
4. The acts complained of herein occurred in Hamilton County, Tennessee, where the Plaintiff was assigned as a result of her employment.

General Allegations

5. Plaintiff, LaTeasha Young, became employed by Defendant on or around September, 2008, as Defendant's Food and Beverage Services Director. Plaintiff was stationed at Defendant's location in downtown Chattanooga, Tennessee.

6. During her employment, Plaintiff performed her job duties acceptably within the guidelines established by Defendant and generally applicable to its employees.

7. In December of 2011, Plaintiff was promoted to the position of Food and Beverage Director.

8. As the Food and Beverage Director, Plaintiff was paid less than prior males who had occupied the position as well as other similarly situated lower ranking male employees.

9. On October 12, 2012, Plaintiff was terminated.

10. The reasons for the Plaintiff's termination were false and were insufficient to merit termination. Male employees were guilty of similar or worse conduct, but were not terminated.

11. Plaintiff was replaced by a male individual.

12. Defendant terminated Plaintiff based on her gender.

Plaintiff's Cause of Action

13. Because of its gender based discrimination, Defendant is guilty of violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*

14. Defendant is guilty of violations of the Equal Pay Act of 1963, 29 U.S.C.A. § 206 (d) for failure to pay equal wages to Plaintiff than that of similarly situated male employees.

Damages

15. As a result of Defendant's violations of federal law, Plaintiff has suffered loss of income and loss of the benefits of employment.

16. As a result of Defendant's violations of federal law, Plaintiff has suffered emotional distress, embarrassment and humiliation.

17. Plaintiff is entitled to compensatory damages, punitive damages, attorney fees and the costs of litigation.

Relief Sought Against Defendant

18. WHEREFORE, LaTeasha Young, demands judgment against the Defendant for compensatory damages, statutory damages plus reasonable attorney fees and all costs.

19. WHEREFORE, Plaintiff demands a jury to try all issues, when joined.

RESPECTFULLY SUBMITTED

PATY, RYMER & ULIN, P.C.

By: 

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